

## EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.  
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

February 10, 1993

**J. K. Hartman**  
Assistant Manager  
Environmental Restoration  
DOE, RFO

POLICY ON DISTRIBUTION OF RADIOACTIVE ENVIRONMENTAL SAMPLES TO COMMERCIAL LABORATORIES - RLB-071-93

Refs: J. K. Hartman Jr (00697) to R. L. Benedetti, Policy on Distribution of Radioactive Environmental Samples to Commercial Laboratories, January 22, 1993

This letter is in reply to the above-referenced letter regarding the Policy on Distribution of Radioactive Environmental Samples to Commercial Laboratories. Your letter requested review and comments, if applicable, on the attached documents. In addition to this review, your request to assess the impact of the policy and its implementation guidance on current radioactive environmental sample distribution to commercial laboratories will be initiated and discussed in the meeting to be set up by your staff.

In response to the policy on Distribution of Radioactive Environmental Samples to commercial laboratories, the EG&G Rocky Flats, Inc. Sample Management (SM) a division of Environmental Restoration Management. Sample Management currently conducts operations in adherence to this policy with a few noted exceptions:

Reference policy attachment 2, page 4, section 5.2a:

Sample Management does not currently require contract laboratories to provide radioisotopic inventories to us. We believe that maintenance of said inventories is the responsibility of the laboratory as it relates to either the Nuclear Regulatory Commission (NRC) or the Agreement States. Real time information with regards to this inventory will be virtually impossible since laboratories routinely analyze samples for more than one Department of Energy (DOE) site. The inventory would be in a constant state of flux and if used as an indicator to accept or reject sample shipments, the variation between receipt of notification from the laboratory to ship samples and the inventory level at the time of actual sample receipt may still result in exceeding licensed radioisotopic inventories. It is incumbent on the laboratories to control incoming samples from clients and to this date, laboratories contracted by the ERM/SMO have maintained this standard. It can also be ascertained that a significant cost impact would be realized in attempting to monitor laboratory inventories.

Reference policy attachment 2, page 5, section 5.2d, items 1-5;

Item #1: SM currently requires and maintains all NRC and Agreement State Licenses on file.

APPROVALS:  
SB:  
TG & TYPIST INITIALS  
LB/KD

## ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCNI  
BY G. T. Ostleick *ST*  
DATE 8-7-93

J. K. Hartman

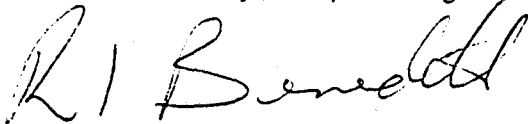
93-RF-1686

February 10, 1993

Page 2

- Item #2: All updates are required to be sent to SM in a timely manner.
- Item #3: Currently not required by SM. This again is due to the volatility of the radioisotopic inventory in total, not to mention a 75 percent threshold capacity.
- Item #4: Currently not required. However, requiring laboratories to notify SM of citations received by the NRC or Agreement State for noncompliance with licensing agreements could serve as an indicator of the laboratories control of inventories.
- Item #5: Cessation of contractual obligations due to violation of NRC or Agreement States License is not built into existing contracts.

If you have any questions or require additional information concerning this matter, please do not hesitate to contact Wanda Busby, Sample Management, at extension 8679.



R. L. Benedetti  
Associate General Manager  
Environmental Restoration Management  
EG&G Rocky Flats, Inc.

WSB:kld

Orig. and 1 cc - J. K. Hartman

Attachments:  
As Stated (2)

cc:

T. Lukow - DOE, RFO  
W. J. Prymak - DOE, RFO